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OFFICE OF THE

June 22, 2001

EXECUTIVE SECRETARY

Mr. David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243

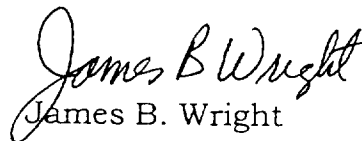
Re: Docket No. 97-00409: All Telephone Companies Tariff Filings
Regarding Reclassification of Pay Telephone Service.
UTSE Discovery to TPOA

Dear Mr. Waddell:

Enclosed for filing are an original and thirteen copies of United Telephone-Southeast, Inc.'s First Set of Discovery to the Tennessee Payphone Owners Association. Copies are being served on counsel of record.

Please contact me if you have any questions.

Sincerely,


James B. Wright

cc: Parties of Record (with enclosure)
Laura Sykora
Kaye Odum

CERTIFICATE OF SERVICE; DOCKET 97-00409
(Pay Telephone Service Reclassification)

The undersigned hereby certifies that on June 22, 2001 the foregoing discovery of United Telephone-Southeast, Inc. to the TPOA was served upon the following parties of record by fax or by depositing a copy thereof in the U.S mail addressed as follows:

Richard Collier
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

Ted G. Pappas
Bass, Berry & Simms
2700 First American Center
Nashville, TN 37238

Consumer Advocate and
Protection Division
425 Fifth Avenue North, 2nd Fl.
Nashville, TN 37243

Guilford R. Thornton, Jr. Esq.
Stokes & Bartholomew
424 Church St, Suite 2800
Nashville, TN 37219-2386

Guy M. Hicks
BellSouth Telecommunications
333 Commerce St., Suite 2101
Nashville, TN 37201-3300

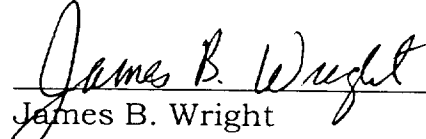
James P. Lamoureux
AT&T Communications
1200 Peachtree Street, Suite 8100
Atlanta, Georgia 30309

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Citizens Telecom
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Nashville, TN 37219-1777


James B. Wright

**BEFORE THE
TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee**

IN RE: All Telephone Companies Tariff Filings Regarding Reclassification of
Pay Telephone Service as Required by FCC Docket 96-128

DOCKET NO. 97-00409

**FIRST SET OF DISCOVERY REQUESTS OF
UNITED TELEPHONE-SOUTHEAST TO TPOA**

Comes now United Telephone-Southeast, Inc, ("Sprint") and propounds this First Set of Discovery Requests to the Tennessee Payphone Owners Association ("TPOA").

Please respond to the following interrogatories and requests for production of documents in accordance with the discovery schedule established in this case.

DEFINITIONS

1. "You" "your" or "TPOA" means the TPOA and all of its member companies and any of their employees, representatives, subsidiaries, affiliates or agents, including experts and counsel.
2. "Document" shall have the broadest possible meaning under applicable law. Document means every writing or record of every type and description that is in your possession, custody or control.

INSTRUCTIONS

In the event the information is not available in the specific format requested, either in part or in total, please provide the information requested in the format maintained in the ordinary course of business.

If you assert that you are entitled to refuse to fully answer any of this discovery, state the exact legal basis for each such refusal.

If any information requested can not be responded to in full, answer to the extent possible and specify the reason for your inability to respond fully, and when applicable, state where and how the information may be obtained or extracted and the person to be contacted.

All interrogatories and requests for production of documents are continuing in nature and require supplemental responses should information later become known or available.

INTERROGATORIES

(1) UTSE filed its Tennessee payphone access line cost study on March 6, 2001 and later filed a revised cost study on May 1, 2001 pursuant to a TRA request (Cost Studies). Please state the name(s) of all persons the TPOA has presently hired or plans to hire to review UTSE's Cost Studies.

(2) Please state the name(s) of all other persons the TPOA has caused or plans to have review UTSE's Cost Studies.

(3) Please state the name(s) of all persons whom the TPOA has hired or plans to hire to review the payphone cost studies of BellSouth Telecommunications,

Inc.; Citizens Telecommunications Company of Tennessee; and/or Citizens Telecommunications Company of the Volunteer State to compare with UTSE's Cost Studies. Specify which persons have been or will be hired to review the costs studies of which company.

(4) Please state the name(s) of all other persons the TPOA has caused or plans to have review the BellSouth and/or Citizens cost studies. Please state which persons have or will review the costs studies of which company.

(5) Please state the names(s) of all persons the TPOA plans to present as witnesses (expert or otherwise) in any hearing before the TRA concerning UTSE's Cost Studies. Please state the particular subject matter upon which each witness is expected to testify, the substance of the facts and opinions (if an expert) to which each witness will testify, and a summary of the grounds for each expert witness' opinion.

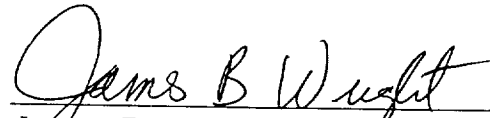
(6) The TRA's February 1, 2001 *Interim Order* stated that incumbent LECs' payphone rates must be (a) cost based, (b) consistent with the requirements of section 276 of the federal act, (c) nondiscriminatory and (d) compliant with the so called "new services test". Please state the *Interim Order* requirements that the TPOA believes Sprint's Cost Studies fails to meet. In particular, please specify which component of Sprint's cost study -- loops, switching, transport, overhead, inputs, payphone specific study, etc -- fails to meet which requirement and explain in full.

REQUESTS FOR PRODUCTION OF DOCUMENTS

- (1) Please provide copies of any documents you have that analyzes UTSE's March 6th or May 1st payphone Cost Studies.
- (2) Please provide copies of any documents you have that compares UTSE's Cost Studies to the cost studies of BellSouth or Citizens.
- (3) Please provide copies of any cost study you have, not prepared by UTSE, that concerns UTSE's payphone access line rates.
- (4) Please provide copies of any documents that the TPOA plans to use or introduce into the record in this proceeding.
- (5) Does the TPOA have specific rates for UTSE's payphone services that it believes meets the requirements of the *Interim Order*? If so, please provide the rates and all supporting rationale.
- (6) Please provide copies of any documents you provide to any other party or person during this proceeding regarding UTSE's cost studies, including copies all responses to discovery or requests for information or data from the Staff of the TRA.

(7) Please provide copies on any documents you used or relied upon in responding to any interrogatory

Submitted this 22nd day of June 2001.

A handwritten signature in cursive script, reading "James B. Wright", written over a horizontal line.

James B. Wright, Senior Attorney
United Telephone-Southeast, Inc.
14111 Capital Boulevard

Wake Forest, North Carolina 27587-5900